

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (FM) ECF Case
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This document relates to:

Bauer et al. v. al Qaeda Islamic Army, et al., 02-cv-7236 (GBD)(FM)

DOROTHEA M. CAPONE, Esq., hereby states under penalty of perjury that:

1. I am an attorney representing the sibling of Sean Rooney who is the subject of this motion in the above captioned litigation, and submit this Declaration in support of the Motion for Partial Final Judgment on behalf of the individual identified in Exhibit A.

2. The sources of my information and the basis for my belief in my statements contained herein are my personal involvement in this matter, my firm's representation of the Rooney Plaintiff listed in Exhibit A in connection with the September 11th terror attacks, other court records relating to the multi district litigation to which these individuals are parties, and conversations with them and other family members. Any matters about which I lack personal knowledge are asserted herein upon information and belief.

3. Sean Rooney died in the September 11, 2001 terror attacks and was survived by his wife, his mother, and five siblings.

4. By Order dated September 12, 2016, the Honorable George Daniels awarded solatium damages to the estate of the wife, mother, and four of the five siblings of Sean Rooney. A copy of this Order is attached as Exhibit B. In preparing the Motion that resulted in this Court's September 12, 2016, counsel inadvertently left out one of Sean Rooney's siblings making it necessary to file this motion to seek an identical award for solatium damages to the

sibling identified in Exhibit A.

5. Counsel apologizes for any inconvenience to this Court arising from this omission.

Dated: November 29, 2016
New York, NY



Dorothea M. Capone